RECEIVED

APR 1 8 2003 80/48

AIR ENFORCEMENT BRANCH, U.S. EPA, REGION 5

April 23, 2003

Mr. George Zerniak USEPA Region 5 77 West Jackson Blvd. AE-17J Chicago, IL 60604-3507

RE: Exception Report for NESHAP, Ohio EPA ID P019

Dear Mr. Zerniak:

Morgan Electro Ceramics 3 month rolling average limit for halogenated solvent usage in degreasing operations is 30.6 lb/month/sq ft surface area. Ohio EPA ID# P019, a degreaser using perchloroethylene has exceeded this limit with 41.2 lb/month/sq ft surface area for the period of 01/01/2003 to 03/30/2003. The inherent reason for the exception was due to an overestimation of volume added and the unit developing a seal leak in the heating section. The overestimation of volume added is produced when the operator responsible for filling the unit, makes conservative assessments of volume added. To correct this, a mechanical flowmeter is being investigated to ensure accurate dispensing volumes. The seal leak in the heating section of the unit was corrected when the unit was tore down and gaskets were replaced. If you have any further questions, please contact me at (440) 232-8600.

Sincerely,

William J. Hocevar, P.E.

Facility Manager

Facility Name:			ctro Ceramics	EPA Facility ID: 1318031627						
Unit Name:			uipment 6342							
Compar	ıy I.D.:	V.P.	D-24	Ohio l	Ohio EPA I.D.: P019					
Month:		Jan	uary		Year: 2003					
Unit Inf	Unit Information									
Tank Le	ngth (inside):	2.92		(feet)						
Tank W	idth (inside):		1.50		(feet)					
Tank Surface Area (s.a.):		a to the second	4.38 (feet) ²							
Solvent Usage Information					Formulas / Notes					
1	Type Solvent Used	Per	chloroethylene							
2	S.G. of Solvent		1.62		[From MSDS]					
3	Solvent Density		13.51	(lb/gallon)	[From MSDS]					
:		 		 1						
4	Solvent Added	10:10:10: 21:21:23:	34.0	(gallon)	[From monthly log]					
5	Waste Removed	:01:01:01 20:03:00	34.0	(gallon)	[From monthly log]					
6	% Solvent in waste		99.90%	(%)	[From analytical report]					
7	Solvent Removed in w	vaste	34.0	(gallon)	[gal. Waste] * [% solvent]					
8	Pure Solvent Removed	d Biblio	0.0	(gallon)	[From monthly log]					
9	Total Solvent Remove	ed 🔛	34.0	(gallon)	[7+8]					
										
10	Total Solvent Emitted	1400 (1400) 1400 (1400) 1400 (1400)	0.0	(gallon)	[4+9]					
11	Total Solvent Emitted		0.5	(lbs)	[10 * 3]					
3.5 (3.3										
	y Emissions									
	ge Solvent	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		 .						
Emiss	sion Rate:		0.1	(lb/month/	[11 / (tank surface area)]					
Average Solvent				_ ft ² s.a.)						
Allowable Rate:			30.6	the state of the s	From 40 CFR 63, Subpart T					
$ft^2 s.a.) \mid$										
Note: If ave. solvent emission rate is < 30.6 lb/month/ft2, NO action is required.										
If ave. solvent emission rate is > 30.6 lb/month/ft ² , Note in quarterly exceedance report.										
Three N	Ionth Rolling Average	.,,								
3 - Month Average Solvent				_						
Emission Rate:			0.1	_](lb/month/	[Average of three previous					
·				ft ² s.a.)	months solvent emission rates					

Facility Name:		Morgan Electro Ceramics		EPA Facility ID: 1318031627					
Unit Name: Company I.D.:		Finishing Equipment 6342 VPD-24		Ohio l	EPA I.D.: <i>P019</i>				
Compar	цу т. D		(T.1)-24] Onto	EIA I.D.				
Month:		February]	Year: 2003				
Unit Information									
Tank Le	ngth (inside):		2.92	(feet)					
Tank Width (inside):			1.50	(feet)					
Tank Surface Area (s.a.):			4.38	(feet) ²					
Solvent	Usage Information				Formulas / Notes				
1	Type Solvent Used	1	Perchloroethylene						
2	S.G. of Solvent		1.62		[From MSDS]				
3	Solvent Density		13.51	(lb/gallon)	[From MSDS]				
		-		_					
4	Solvent Added		0.0	(gallon)	[From monthly log]				
5	Waste Removed		0.0	(gallon)	[From monthly log]				
6	% Solvent in waste		99.90%	(%)	[From analytical report]				
7	Solvent Removed in	waste	0.0	(gallon)	[gal. Waste] * [% solvent]				
8	Pure Solvent Remov	ed	0.0	(gallon)	[From monthly log]				
9	Total Solvent Remov	zed	0.0	(gallon)	[7+8]				
		_							
10	Total Solvent Emitte	d	0.0	(gallon)	[4+9]				
11	Total Solvent Emitte	d 🗓	0.0	(lbs)	[10 * 3]				
Monthly	y Emissions								
-									
Average Solvent Emission Rate:			0.0	(lb/month/	[11 / (tank surface area)]				
			V•V	≟ `	[11 / (tank surface area)]				
Average Solvent		[<u>[</u>		$ft^2 s.a.)$	D 40 CED 43 C 1 4 E				
Allowable Rate:			30.6	4	From 40 CFR 63, Subpart T				
$\mathbf{ft}^2 \mathbf{s.a.})$									
Note: If ave. solvent emission rate is < 30.6 lb/month/ft2, NO action is required. If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.									
		rterly exceedance report.							
Three N	Month Rolling Average								
_									
3 - Month Average Solvent		_		7					
Emission Rate:			0.1		[Average of three previous				
				ft ² s.a.)	months solvent emission rates				

Facility Name: Unit Name: Company I.D.:		Morgan Electro Ceramics Finishing Equipment 6342 VPD-24		EPA Facility ID: 1318031627 Ohio EPA I.D.: P019			
Month:			March		Year: 2003		
	formation						
	ngth (inside):		2.92	(feet)			
Tank Wi	idth (inside):		1.50	(feet)			
Tank Surface Area (s.a.):			4.38	(feet) ²			
Solvent	Usage Information				Formulas / Notes		
1	Type Solvent Used		Perchloroethylene				
2	S.G. of Solvent		1.62		[From MSDS]		
3	Solvent Density		13.51	(lb/gallon)	[From MSDS]		
4	Solvent Added		40.0	(gallon)	[From monthly log]		
5	Waste Removed		0.0	(gallon)	[From monthly log]		
6	% Solvent in waste		99.90%	(%)	[From analytical report]		
7	Solvent Removed in wa	aste	0.0	(gallon)	[gal. Waste] * [% solvent]		
8	Pure Solvent Removed		0.0	(gallon)	[From monthly log]		
9	Total Solvent Removed	i	0.0	(gallon)	[7+8]		
10	Tatal Calmant Emitted			le n v	F 4 + 0.7		
10	Total Solvent Emitted Total Solvent Emitted		40.0	(gallon)	[4+9]		
11	Total Solvent Emitted		540.4	(lbs)	[10 * 3]		
Monthly	y Emissions				, , , , , , , , , , , , , , , , , , , ,		
Averag	ge Solvent						
Emission Rate:			123.4	(lb/month/ ft ² s.a.)	[11 / (tank surface area)]		
Avera	ge Solvent						
Allowable Rate:			30.6](lb/month/ ft ² s.a.)	From 40 CFR 63, Subpart T		
	notion is required						
Note: If ave. solvent emission rate is < 30.6 lb/month/ft2, NO action is required. If ave. solvent emission rate is > 30.6 lb/month/ft², Note in quarterly exceedance report.							
Three	If ave. solvent emission Ionth Rolling Average	nerry exceedance report.					
I III ee IV	Touth Norming Average						
3 - Month Average Solvent							
Emission Rate:			41.2](]b/month/	Average of three previous		
			, 1.12	ft^2 s.a.)			
				11 S.a.)	months solvent emission rates		